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April 22, 2021

VIA ECF

Honorable John P. Cronan
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Michael Nelson et al. v. City of New York, et al.,
18-cv-04636 (JPO) (SDA)

Your Honor:

I am a Senior Counsel in the Office of Corporation Counsel and the attorney assigned to the defense of defendants City of New York, Miszuk, Tkaczuk, Frangatos, and Cortes. The parties write jointly to respectfully request that the Court: (1) stay discovery in this matter until the conclusion of the settlement conference currently scheduled for May 10, 2021; and (2) grant the parties sixty (60) days to complete discovery should the parties not resolve the case at the settlement conference.

By way of background, the parties have completed the majority of fact discovery in this matter, with only five (5) depositions remaining. The parties have conferred and believe that in order to stem costs and fees in this matter prior to the settlement conference and make a good faith effort at the settlement conference, the best course of action would be to stay all discovery in the matter pending the settlement conference. Should the parties reach a settlement on May 10, 2021, then there would be no need to seek any amendment of the case management plan. Should the parties fail to settle on May 10, 2021, then the parties would request that the Court grant an additional sixty (60) days to complete fact discovery, which would be sufficient to complete all outstanding discovery matters in this litigation.

Based on the foregoing, the parties respectfully request that the Court: (1) stay discovery in this matter until the conclusion of the settlement conference currently scheduled for May 10, 2021; and (2) grant the parties sixty (60) days to complete discovery should the parties not resolve the case at the settlement conference.

Respectfully Submitted,

/s/ Omar J. Siddiqi

Omar J. Siddiqi
Senior Counsel

Cc: Jeffrey Rothman (by ECF)
Bruce Turkle (by ECF)

Defendants' request is granted. All discovery in this matter is stayed until May 10, 2021. The parties shall file a letter by May 13, 2021 updating the Court on the outcome of that conference. In the event that the parties do not settle this case, the parties shall have until July 9, 2021 to complete discovery.

SO ORDERED.

Date: April 22, 2021
New York, New York



JOHN P. CRONAN
United States District Judge